1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 OCEAN SERVICES, LLC, a Washington NO. 2:22-cv-01058-JHC 11 limited liability company, 12 Plaintiff, STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE 13 DISMISSAL PAPERWORK v. 14 OMNI2MAX, INC., a California Corporation 15 Defendant. 16 OMNI2MAX, INC., a California Corporation, 17 18 Counterclaimant/Third-Party Plaintiff, 19 v. 20 OCEAN SERVICES, LLC, a Washington limited liability company, 21 Counter-defendant, 22 STABBERT MARITIME, LLC, a Washington limited liability company, 23 OCEAN GUARDIAN HOLDING, LLC, a 24 Washington limited liability company, 25 Third-Party Defendants 26 27 STIPULATION AND ORDER - 1 NO. 2:22-cv-01058-JHC

STIPULATION

The parties, by and through their undersigned counsel of record, hereby stipulate, consent and agree as follows:

- 1. This case involves issues related to an ongoing contract.
- 2. Although the parties have settled the issues related to the pending lawsuit, there has been an issue regarding the final settlement agreement and how it impacts performance of the contract moving forward.
- 3. The tentative settlement agreement included an arbitration clause to resolve these issues, and the parties may conduct arbitration to resolve these issues.
- 4. The parties request an additional thirty days to complete the final paperwork and, if necessary, conduct arbitration.

DATED: October 18, 2023. PROCOPIO, CORY, HARGREAVES & SAVITCH LLP

By:

/s/ Sean M. Sullivan

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ORDER

Having considered the parties' stipulation, the Court hereby orders that the parties shall have until November 21, 2024 to submit the closing paperwork.

IT IS SO ORDERED.

Dated this 18th day of October, 2024.

John H. Chun John H. Chun

United States District Judge